

9/7/2023

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

United States of America
v.
EMEKA OLISA EZIOLISA
aka CHUKWUEMEKA O. EZIOLISA

Case No. 3:23-mj-366

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 8/2023 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 USC s. 1028(a)(7)

Offense Description
without lawful authority, possessing a means of identification of another
person with the intent to commit or aid and abet various federal felony
crimes, including bank fraud, see 18 U.S.C. § 1344, and wire fraud, see 18
U.S.C. § 1343

This criminal complaint is based on these facts:

See Attached Affidavit of Angie M. Kremer

☒ Continued on the attached sheet.

Angie M. Kremer
Complainant's signature

Angie M. Kremer, U.S. Postal Inspector
Printed name and title

Sworn to by reliable electronic means -- namely, telephone.

Date: September 7, 2023

City and state: Dayton, Ohio

Caroline H. Gentry
United States Magistrate Judge



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

EMEKA OLISA EZIOLISA
aka CHUKWUEMEKA O. EZIOLISA

Case No. 3:23-mj-366

AFFIDAVIT IN SUPPORT OF COMPLAINT

The undersigned, Angie M. Kremer, being first duly sworn deposes and states as follows:

1. I am a United States Postal Inspector, having been so employed since June 1, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. I have gained experience through completion of the Basic Inspector Training (BIT) in August of 2013. During BIT training, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, financial crimes investigations, interviewing, and evidence collection. Since August 2013, I have worked with various federal, state, and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.

2. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon surveillance, my interview of various witnesses and review of various records/tracking data and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is provided for the limited purpose of establishing probable cause to support a search warrant, I have not included all details and aspects known by this investigation, but rather, I have set forth only those facts that I believe are necessary to establish probable cause.
3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1028(a)(7) (fraud and related activity in connection with identification documents) have been committed by EMEKA OLISA EZIOLISA, aka CHUKWUEMEKA O. EZIOLISA (hereinafter "EZIOLISA").

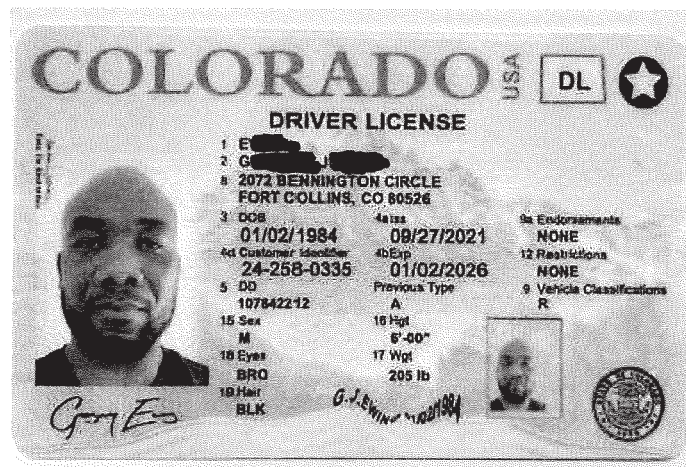
PROBABLE CAUSE

4. On or about August 29, 2023, Inspectors were contacted by a Fifth Third Special Investigator concerning an individual (later identified as EZIOLISA) who was engaged in fraudulent banking activity at their one of their financial institutions at 2601 Far Hills Avenue, Oakwood, Ohio 45419. Specifically:
 - a. The Special Investigator explained that, fraudulently using the personal identifiers of a real person identified herein by the initial G.J.E., EZIOLISA had falsely opened online a Fifth Third Bank account using G.J.E.'s name without G.J.E.'s knowledge or permission. (The Special Investigator personally spoke with G.J.E., a resident of Colorado, who confirmed that someone had stolen his identity and that he had not authorized or opened the Fifth Third Bank account. I too spoke with G.J.E. who confirmed this information). Soon after the fraudulent account became active, it began receiving interstate wire transfers totaling

hundreds of thousands of dollars in health care payments. Notably, the account had been opened for a purported construction business. Based on these circumstances, the Special Investigator concluded that the account was being funded with proceeds from fraudulent activity that were being funneled through the account that EZIOLISA improperly had opened in G.J.E.'s name. Through further investigation, the Special Investigator found another fraudulent account that EZIOLISA had opened but this time in the name of Walter Swanson¹. The Special Investigator learned that some funds wire transferred into this Swanson account had originated from an email compromise scheme in which a business was duped into directing money to the Swanson account. The Special Investigator ultimately froze the accounts that EZIOLISA opened.

- b. Prior to Fifth Third identifying the fraudulent nature of the account, EZIOLISA arrived at a branch of the financial institution in Oakwood, Ohio during August 2023. Representing himself as G.J.E., EZIOLISA performed a withdrawal of \$12,000 in cash from the fraudulent G.J.E. account. In conducting this transaction, EZIOLISA presented a false driver license incorrectly identifying himself as G.J.E.
- c. Shortly after Fifth Third froze the account, EZIOLISA contacted this financial institution, questioning why he could no longer access the G.J.E. account. Fifth Third directed him to its Oakwood branch to resolve the issue.
- d. On or about August 29, 2023, EZIOLISA arrived at the Fifth Third Branch in Oakwood and once again represented himself as G.J.E. By this time, Fifth Third had contacted Oakwood police who responded to the bank and spoke with EZIOLISA who continued to insist falsely that he was G.J.E. EZIOLISA provided a false Colorado Driver's License bearing his picture but the name of G.J.E. with an address of 2072 Bennington Circle, Fort Collins, CO 80526. A photograph of the identification is pictured below.

¹ Based on a preliminary investigation, Walter Swanson currently appears to be a fictitious person.



- e. Additionally, EZIOLISA had: a social security card bearing the name G.J.E. with a social security number ending in 6314; and a Fifth Third Bank Business Debit card in the name of an LLC purportedly owned by G.J.E. Notably, the purported social security card bore the true social security number of G.J.E.
 - f. Officers identified the vehicle that EZIOLISA had driven to the Fifth Third and ran the Ohio registration tag, which returned to EZIOLISA at 2517 Yoland Drive, Dayton, Ohio 45417. The Ohio BMV Vehicle registration photo associated with the vehicle registration bore the same pictorial features as EZIOLISA (as well the image on the fraudulent G.J.E. license that he presented to police). Oakwood police detained EZIOLISA and transported him to the Montgomery County Jail to confirm his true identification. While there, he provided intake deputies with the name G.J.E., but a social security number ending in 6142, associated with an entirely different person. Deputies ran EZIOLISA's fingerprints on the Live ID Machine, and he was positively identified as EZIOLISA. EZIOLISA was detained at the Montgomery County Jail.
5. I learned that EZIOLISA listed an address of 1333 E. Second Street, Unit 1167, Dayton, OH 45403 on the fraudulent G.J.E. Fifth Third Account. The address corresponded to Early Express, a commercial mail receiving agency where individuals can rent a mailbox and receive mail. By federal law, commercial mail receiving agencies must keep Postal

Service Form 1583 on file with all relevant account opening identification documents. Currently, two names are authorized to receive mail there: Walter Swanson and G.J.E. Early Express made copies of the identifications used to open the account. The Walter Swanson identification bore EZIOLISA's picture on it. The G.J.E. identification was identical to that recovered from EZIOLISA at Fifth Bank with one exception – the photograph on the document was of a different Black male.

6. Law enforcement obtained and executed a search warrant for the Early Mail Express Box rented under the G.J.E. and Swanson names.² Law enforcement officers recovered multiple pieces of delivered mail bearing the return addresses of financial institutions and addressed to G.J.E. An item recovered from this search included correspondence from Fifth Third Bank addressed to the fraudulent account being utilized by EZIOLISA when Oakwood Police encountered him on August 29, 2023, at the Fifth Third branch.
7. Based on a preliminary investigation, law enforcement has identified at least a half-dozen financial institutions where EZIOLISA has opened fraudulent accounts in the names of, among others, G.J.E. and WalterSwanson. The financial institutions have frozen many of these accounts given the suspected fraudulent nature of wire transfers into them.
8. Based on the foregoing, I believe that there is probable cause to believe that EZILOISA, without lawful authority, possessed a means of identification of another person – namely,

² Your affiant reviewed EZIOLISA's recorded inmate calls from the Montgomery County jail. In a call placed on August 29, 2023 to his girlfriend, Victoria Glover, EZIOLISA instructs her to take an Uber to the Fifth Third bank in Oakwood to retrieve his car. In a subsequent call on the same day, Ms. Glover advises EZIOLISA that she could not find the car at the bank and learned it was impounded and on hold by Oakwood Police. Ms. Glover advised EZIOLISA that the website says he has court the following day at 9:00am. EZIOLISA then instructs Ms. Glover to get a pen and paper to write down "Early Express Unit 1167." He then instructs her to go to that location and "grab the mail around 3:00 tomorrow." Ms. Glover did attempt to retrieve the mail at this location but was unable to.

the name and social security number of G.J.E. – with the intent to commit or aid and abet various federal felony crimes, including bank fraud, *see* 18 U.S.C. § 1344, and wire fraud, *see* 18 U.S.C. § 1343, all in violation of 18 U.S.C. § 1028 (a) (7).

Angie M. Kremer

Angie M. Kremer,
Postal Inspector
United States Postal Inspector

By reliable electronic means (telephone)

Subscribed and sworn to before me on this 7th day of September 2023


Caroline H. Gentry
United States Magistrate Judge

